

Robert R. Kracht
Nicholas R. Oleski
McCARTHY, LEBIT, CRYSTAL
& LIFFMAN Co., LPA
1111 Superior Avenue East
Suite 2700
Cleveland, Ohio 44114
Phone: (216) 696-1422
Email: rrk@mccarthylebit.com
nro@mccarthylebit.com

Counsel for Michael Legg

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*¹

Debtors.

Chapter 11

Case No. 22-10943 (MEW)

Jointly Administered

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Robert R. Kracht and Nicholas R. Oleski, of the law firm McCarthy, Lebit, Crystal & Liffman Co., LPA, hereby appear in the above-referenced chapter 11 cases to represent Michael Legg and, pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), hereby request that copies of all notices and pleadings given or required to be given in this case, and all papers served or required to be served in this case, be delivered and served upon the undersigned attorneys at the following

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (N/A); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

address, telephone and facsimile numbers and email addresses, and further request to be added to the master service list established in this case:

Robert R. Kracht
Nicholas R. Oleski
McCARTHY, LEBIT, CRYSTAL
& LIFFMAN CO., LPA
1111 Superior Avenue East
Suite 2700
Cleveland, Ohio 44114
Phone: (216) 696-1422
Email: rrk@mccarthylebit.com
nro@mccarthylebit.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all other notices, papers, reports, orders, agenda letters, applications, motions, petitions, pleadings, requests, complaints or demands, statements of affairs, operating reports, schedules of assets and liabilities whether formal or informal, whether written or oral, and whether transmitted or conveyed by the United States, overnight or electronic mail, facsimile, courier, telephone, telegraph, telex or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended, and shall not be deemed or construed, to be a waiver or release of Michael Legg's rights including, without limitation, (i) against the Debtors or any other person or entity, (ii) to a jury trial in any proceeding so triable herein or, in any case, any controversy or proceeding related hereto, (iii) to have any unliquidated portions of its claims determined by an applicable court other than the Bankruptcy Court, (iv) to have the reference withdrawn by the United States District Court for the Southern District of New York in any matter subject to mandatory or discretionary withdrawal, (v) to setoff or recoupment, (vi) to consent to the jurisdiction of the United States Bankruptcy Court, or (vii) any other rights,

claims, actions, or defenses to which Michael Legg may be entitled under agreements, in law, or in equity, all of which rights, claims, actions and defenses are expressly reserved.

Dated: August 17, 2022

Respectfully submitted,

/s/ Nicholas R. Oleski

Robert R. Kracht

Nicholas R. Oleski

MCCARTHY, LEBIT, CRYSTAL

& LIFFMAN CO., LPA

1111 Superior Avenue East

Suite 2700

Cleveland, Ohio 44114

Phone: (216) 696-1422

Email: rrk@mccarthylebit.com

nro@mccarthylebit.com

Counsel for Michael Legg